

Shayla Myers (SBN: 264054)
Romy Ganschow (SBN: 320294)
LEGAL AID FOUNDATION OF LOS ANGELES
7000 S. Broadway, Los Angeles, CA 90003
Tel.: (213) 640-3983
E-Mail: smyers@lafla.org
rganschow@lafla.org

*Attorneys for Gladys Zepeda, Miriam Zamora,
Ali El-Bey, James Haugabrook, Pete Diocson Jr.,
Marquis Ashley, and Ktown for All*

Additional Attorneys on Next Page

UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA, WESTERN DIVISION

JANET GARCIA, GLADYS ZEPEDA,
MIRIAM ZAMORA, ALI EL-BEY,
PETER DIOCSON JR, MARQUIS
ASHLEY, JAMES HAUGABROOK,
individuals, KTOWN FOR ALL, an
unincorporated association;
ASSOCIATION FOR RESPONSIBLE
AND EQUITABLE PUBLIC
SPENDING, an unincorporated
association

Plaintiff(s),

vs.

CITY OF LOS ANGELES, a municipal
entity; DOES 1-7,

Defendant(s).

CASE NO. 2:19-cv-06182-DSF-PLA

**DECLARATION OF PHUONG
NGUYEN**

1 Catherine Sweetser (SBN: 271142)
2 Kristina Harootun (SBN: 308718)
3 SCHONBRUN SEPLOW HARRIS & HOFFMAN LLP
4 11543 W. Olympic Blvd.,
5 Los Angeles, CA 90064
6 Tel.: (310) 396-0731
7 Email: csweetser@sshhlaw.com
8 kharootun@sshhlaw.com

9 *Attorneys for Plaintiffs.*

10 Benjamin Allan Herbert (SBN: 277356)
11 William L. Smith (SBN: 324235)
12 KIRKLAND & ELLIS LLP
13 555 S. Flower St., Los Angeles, CA 90071
14 Tel.: (213) 680-8400
15 Email: benjamin.herbert@kirkland.com
16 william.smith@kirkland.com

17 *Attorneys for Plaintiffs Ktown for All, Ali El-Bey,*
18 *Peter Diocson Jr., Marquis Ashley, Association for Responsible*
19 *and Equitable Public Spending, and Janet Garcia.*
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DECLARATION OF PHUONG NGUYEN

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2 1. My name is Phuong Nguyen, and I usually go by Jane Nguyen.
3 I have personal knowledge of the facts contained in this declaration, and if
4 called to testify, I could and would testify competently as to the truth of the
5 facts in this declaration.

6 2. I am the co-founder and a core organizer of Ktown for All.

7 3. Ktown for All was founded in 2018 to support the construction
8 of the Bridge Home shelter in Koreatown. The mission of Ktown for All is
9 to support unhoused residents, to form connections between housed and
10 unhoused residents of Koreatown, and to advocate for housing and shelters
11 and other services in the Koreatown community.

12 4. We meet monthly with the general membership, and we have
13 committees that meet every other week. We also meet with other service
14 providers in the area such as churches and the Peer Resource Center. We
15 send members to city council meetings and neighborhood council meetings,
16 and we organize vigils and other types of community advocacy to advance
17 our mission. It is integral to our mission to have unhoused persons included
18 in our meetings and participating in advocacy. The organization also does
19 outreach to unhoused neighbors every Saturday, except for the first Saturday
20 of the month when we have our general meeting.

21 5. One unhoused member named Muhammad moved to a new
22 location after a cleanup, which we call a sweep, by LA Sanitation. I used to
23 see him at 6th and Ardmore regularly before he moved. The sweep happened
24 in August. After he moved we did not connect with him again until
25 November. I was present when the organization connected with him again
26 during outreach, and he told us that he moved because of the sweep. After
27 we connected with him again, he came to a general meeting of the
28 organization. This is just one example, but there are other members we have

1 also lost contact with because they moved after the sweeps. I have
2 personally been present on multiple occasions where members told us they
3 had moved because of sweeps.

4 6. Monitoring of the sweeps in our neighborhood, and organizing
5 replacements for people whose belongings have been taken, takes time and
6 resources away from these other advocacy activities.

7 7. We are concerned about the well-being of our unhoused
8 members and neighbors. It makes it harder for them to get into housing
9 when they spend their time and resources to replace survival items. The fear
10 of losing their items also keeps them from going to appointments and to our
11 meetings. Monitoring the sweeps and replacing people's items is necessary
12 to ensure that unhoused members can advocate for themselves, organize
13 with us, and ultimately get into housing.

14 8. I had a meeting this morning at 10 AM about the Bridge Home
15 Shelter with Nick Price and Nic Emmons, members of our organization, and
16 representatives from United Way and a homeless service provider, about
17 how we could best work to identify community members and help them go
18 into the shelter. I was on my way to the meeting when I got a text that one
19 of our unhoused neighbors needed help because of a clean up. Nick Price
20 called me and told me that he had gotten a call from a neighbor and that they
21 needed people to monitor the sweep. He, Nic, and the representative from
22 United Way were all going to the clean up, and he said that we would meet
23 afterward.

24 9. Instead of meeting at 10:00 AM as planned, we met around
25 10:40 AM, after people finished helping our unhoused neighbor by
26 monitoring the sweep and advocating for him against the property
27 confiscation.

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1 10. My organization spends a significant amount of time
2 monitoring what is happening with the sweeps and advocating for our
3 unhoused neighbors not to lose their property. Just as happened this
4 morning, this time spent monitoring cuts into our time for meetings and
5 organizing. We could be advocating in other ways if we did not have to
6 monitor property destruction and spend time replacing people's property.

7 11. My organization has replaced people's property frequently. We
8 often buy tents when they are taken by LA Sanitation. We also directly
9 provide brooms, socks, sleeping bags, blankets, underwear, and warm
10 clothes. Although we have not directly provided carts or crates, I do spend
11 time in my capacity as an organizer for Ktown for All posting things that
12 people lose on social media so that community members can buy and
13 replace things for our unhoused neighbors. We have done that for a small
14 cart and a cooler. People order the things to be delivered to a member's
15 residence, and then that member takes them to the people on the street.
16 There are three different members we have accepting deliveries, including
17 co-founder Mike Dickerson.

18 12. I met an unhoused neighbor named Rachelle Bettega many
19 months ago. After we had spoken several times, she told me that she wanted
20 to be a member of Ktown for All. I have brought her in the past a tarp,
21 blankets, wet wipes, clothes, socks, food, and resource sheets. The resource
22 sheets are a list of food pantries and showers nearby that she can go to.

23 13. Rachelle told me that the sanitation workers will not let her
24 keep bins. She told me that her clothes have gotten moldy and wet from
25 rain. After she told me that, Ktown for All brought her more clothes. I was
26 personally present along with another member when we brought her more
27 clothes.
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